



HON. SYLVIA O. HINDS-RADIX  
Corporation Counsel

THE CITY OF NEW YORK  
LAW DEPARTMENT  
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Defendant's unopposed request is granted. Defendant shall respond to the Complaint by May 6, 2022. The parties shall file a joint status letter by May 9, 2022. The Court ordered mediation is adjourned *sine die*.

April 1, 2022

**VIA ECF**

Hon. John P. Cronan  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl Street  
New York, NY 10007-1312

SO ORDERED.

Date: April 4, 2022  
New York, New York

JOHN P. CRONAN  
United States District Judge

Re: *L.L. v. N.Y.C. Dep't of Educ.*, 21-cv-9240 (JPC)(JLC)

Dear Judge Cronan:

I am a Special Assistant Corporation Counsel in the office of Corporation Counsel, Hon. Sylvia O. Hinds-Radix, attorney for Defendant in the above-referenced action, wherein Plaintiff seeks solely attorneys' fees, costs and expenses for legal work on an administrative hearing under the Individuals with Disabilities Education Act, 20 U.S.C. §1400, et seq. ("IDEA"), as well as for this action.

We write to respectfully request a 30-day extension Defendant's time to respond to the complaint from April 6 to May 6, 2022, with a corollary 30-day extension of the parties' time to file a joint status letter. This is the third request for an extension of this deadline. The second request was granted by Your Honor on March 2, 2022 (ECF No. 13). We also respectfully request an adjournment of the Court Ordered mediation *sine die*. Plaintiff consents to our requests.

We are happy to report that Defendant presented an offer of settlement to Plaintiff, and the parties thereafter held a productive and lengthy telephone conference to discuss the case. The additional time requested should allow the parties to bring the case to a successful conclusion. As with the overwhelming majority of similar federal actions seeking IDEA fees and costs, we are hopeful that the parties will settle this matter without the need for any Court intervention.

Accordingly, we request a 30-day extension of Defendant's time to answer until May 6, a 30-day extension of the parties' time to file a joint status letter until May 9, 2022, and an adjournment of the Court Ordered mediation.

Thank you for considering these requests.

Respectfully submitted,

/s/

Peter L. Germanakos  
Special Assistant Corporation Counsel

cc: Lauren A. Baum, Esq. (via ECF)